

Subject Access Policy for the North West Aerospace Alliance (NWAA)

Introduction

The General Data Protection Regulation (GDPR) provides individuals with enhanced rights regarding their personal data, including the right to access, correct, or erase their data. As a Data Controller, the North West Aerospace Alliance (NWAA) must be able to comply with these rights when they are exercised by Data Subjects.

Under the GDPR, individuals have the following rights:

- Right of Access (Subject Access Request)
- Right to Rectification
- Right to Erasure (Right to be Forgotten)
- Right to Restrict Processing
- Right to Data Portability
- Right to Object
- Rights in Relation to Automatic Decision Making and Profiling

It is crucial that if a request related to any of these rights is received, it is handled in accordance with the procedure set out in this policy.

Data Subjects can submit requests verbally (e.g., by phone), in writing (via email), or by postal letter.

Purpose

This policy outlines the procedure to follow when the North West Aerospace Alliance receives a Data Subject request related to the rights specified in the GDPR. It ensures that NWAA handles these requests in compliance with the relevant regulations.

Responsibilities

All staff members are responsible for recognizing when a request is made and for ensuring it is passed to the appropriate team for processing, as outlined in this policy.

Procedure

1. Receiving a Request

When a Data Subject request is received (whether verbal, email, or postal), the staff member handling the request must immediately forward it to the NWAA Data Protection Team.

- **Email:** Send the request to membership@aerospace.co.uk
- **Phone:** If the request is made by phone, the staff member must capture as much detail as possible and send it to the Data Protection Team via the above email.

2. Postal Letter: Scan and email the letter to the Data Protection Team or forward the original to the NWAA office at:

For the Attention of The CEO, North West Aerospace Alliance, Suite 202
Pendle Business Centre, Trafalgar Court, Commercial Road, Nelson
Lancashire, BB9 9BT

3. **Processing the Request**

Upon receiving the request, the Data Protection Team will process it in accordance with the applicable law and respond to the Data Subject within the prescribed time limits. The Data Protection Team may request additional information or data from relevant departments within NWAA to ensure full compliance with the request. All teams involved should prioritize these requests due to the strict deadlines.

4. **Uncertainty or Ambiguity**

If there is any doubt about whether a request meets the criteria for a Data Subject right, staff should consult the Data Protection Manager for guidance.

Appendix 1 – Rights of Data Subjects

Right of Access (Subject Access Request)

Data Subjects have the right to obtain:

- Confirmation of whether their data is being processed
- Access to their personal data
- Additional supplementary information related to the processing of their data

Subject Access Requests must be responded to within **10 working days**.

Right to Rectification

Data Subjects are entitled to request the correction of inaccurate or incomplete personal data. If the data has been disclosed to a third party, NWAA must inform the third party of the rectification request where possible. The Data Subject should also be informed of the third parties involved, where appropriate.

Requests for rectification must be responded to within **10 working days**.

Right to Erasure (Right to be Forgotten)

This right allows Data Subjects to request the deletion or removal of personal data if it is no longer necessary for the purposes for which it was originally collected.

The Right to Erasure applies in the following situations:

- The personal data is no longer needed
- Consent has been withdrawn
- The individual objects to processing and there is no overriding legitimate interest
- The data is being processed unlawfully
- Erasure is required to comply with a legal obligation

Requests for erasure must be processed within **10 working days**.

Right to Restrict Processing

Data Subjects may request that their personal data is stored but not further processed. Restricted data may still be retained to ensure that the restriction is observed.

This right applies in the following circumstances:

- If the accuracy of the data is contested, processing should be restricted while accuracy is verified.

- If the Data Subject objects to processing for legitimate interests, processing should be restricted while the objection is reviewed.
- If the processing is unlawful and the Data Subject opposes erasure, processing should be restricted.
- If the Data Controller no longer needs the data but the Data Subject requires it for a legal claim.

Right to Data Portability

Data Subjects can request to obtain and reuse their personal data for their own purposes, including transferring it to other services. This right applies when:

- The data was provided directly by the Data Subject
- The processing is based on consent or contract performance
- The processing is carried out by automated means

Requests for data portability must be processed within **10 working days**.

Right to Object

Data Subjects can object to:

- Processing based on legitimate interests or public tasks (including profiling)
- Direct marketing (including profiling)
- Processing for scientific, historical research, or statistical purposes

Requests to object must be processed promptly and addressed in accordance with the law.

Rights in Relation to Automatic Decision Making and Profiling

This right ensures that individuals are protected from decisions made solely on automated processing, especially where these decisions produce significant legal or similar effects on the individual. The right does not apply when:

- The decision is necessary for entering into or performance of a contract
- The decision is authorised by law
- The decision is based on explicit consent
- The decision does not have a significant effect on the individual

Requests in relation to automatic decision-making and profiling must be processed in line with the GDPR.

For further information or to submit a request, please contact as follows:

For the Attention of The CEO, North West Aerospace Alliance, Suite 202
Pendle Business Centre, Trafalgar Court, Commercial Road, Nelson, Lancashire, BB9 9BT